

Remarks

Reconsideration and reexamination of the above-identified patent application, as amended, are respectfully requested. Claims 1-22 are pending in this application upon entry of this Amendment. In this Amendment, the Applicant has amended claims 1, 5, 10, 14-15, 17, and 20. No claims have been cancelled or added in this Amendment.

Claim Rejections - 35 U.S.C. § 102

In the Office Action mailed on February 2, 2004, the Examiner rejected claims 1-22 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,128,912 issued to Hug et al. ("Hug"). The Applicant believes that the claimed invention is patentable over Hug and has amended independent claims 1, 14-15, and 17 to more clearly define thereover.

1. The Claimed Invention

The claimed invention as recited in amended independent claims 1, 14-15, and 17 is generally directed to a storage library for the storage and retrieval of media objects. Amended independent claims 1 and 14 recite a storage library, amended independent claim 15 recites a robotic mechanism for a storage library, and amended independent claim 17 recites a method of operating a storage library.

As recited in representative amended independent claim 1, the storage library includes a frame and first and second horizontally arranged rows of media object storage cells arranged within the frame in a common plane. Each storage cell is for housing a media object. A horizontally arranged track is attached to the frame and is arranged in the common plane. The track is disposed adjacent to the first row of storage cells. A robotic mechanism is coupled to the track for moving horizontally along the track. A media object manipulation mechanism is coupled to the robotic mechanism. The manipulation mechanism is vertically movable for moving between the first and second rows of storage cells when the robotic

mechanism is coupled to the track in order to manipulate the media objects housed within the first and second rows of storage cells.

2. Hug

As disclosed in FIGS. 1-2 and col. 4, lines 29-57, Hug discloses a storage library 12 having rows of media object cells within a frame. Hug also discloses a robotic mechanism (i.e., carriage assembly) 26 for moving vertically between the rows. Robotic mechanism 26 is independently supported for vertical movement between the rows by an overall carriage support arrangement 30. Support arrangement 30 includes a pair of horizontally arranged upper and lower tracks 32 and 34 which support a vertically extending post 36. Tracks 32 and 34 extend between the frames of storage library 12 and another storage library 14. Robotic mechanism 26 is movable vertically along post 36 and the post is horizontally movable along tracks 32 and 34.

3. The Claimed Invention Compared to Hug

The claimed invention generally differs from Hug in that in the claimed invention a track is attached to a frame of the storage library and is arranged in the common plane of the rows of storage cells which are arranged within the frame. A robotic mechanism is coupled to the track for moving along the track. In contrast to being attached to a frame of the storage library, tracks 32 and 34 of Hug extend between the frames of storage libraries 12 and 14. As such, tracks 32 and 34 of Hug are not attached to the frame of either storage library 12 or 14.

Further, tracks 32 and 34 are respectively positioned at levels adjacent the top and bottom rows of storage cells. As such, Hug does not teach or suggest horizontally arranged tracks disposed between rows of storage cells as recited in dependent claims 6 and 10 and amended independent claims 14-15.

In view of the foregoing remarks and amendments, the Applicant believes that amended independent claims 1, 14-15, and 17 are patentable over Hug. Claims 2-13, 16, and 18-22 depend from one of the amended independent claims and include the limitations therein. Thus, the Applicant respectfully requests reconsideration and withdrawal of the rejection to the claims under 35 U.S.C. § 102(b) in view of Hug.

CONCLUSION

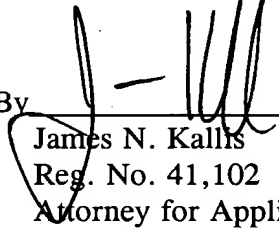
In summary, claims 1-22, as amended, meet the substantive requirements for patentability. The case is in appropriate condition for allowance. Accordingly, such action is respectfully requested.

If a telephone or video conference would expedite allowance or resolve any further questions, such a conference is invited at the convenience of the Examiner.

Respectfully submitted,

TIMOTHY C. OSTWALD et al.

By


James N. Kallis
Reg. No. 41,102
Attorney for Applicant

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BROOKS KUSHMAN P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075-1238
Phone: 248-358-4400
Fax: 248-358-3351